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8 UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10

11 RUSSELL E. BURNS, et al.,

12 Plaintiffs,

13 v.

14 TITAN DVBE, INC., a California Corporation;  
WILLIAM SCHROYER, an Individual,

15 Defendants.  
16  
17

Case No.: C13-5886 SBA

**PLAINTIFFS REQUEST FOR  
CONTINUANCE OF CASE  
MANAGEMENT CONFERENCE; and  
~~[PROPOSED]~~ ORDER THEREON**

Date: Wednesday, May 28, 2014

Time: 2:45 p.m.

Ctrm: 1, 4th Floor

1301 Clay Street

Oakland, California

Judge: The Honorable Sandra B. Armstrong

18  
19 Plaintiffs respectfully request that the Case Management Conference scheduled for May  
20 28, 2014, at 2:45 p.m., be continued for approximately sixty (60) days, as follows:

21 1. As the Court's records will reflect, this action was filed on December 19, 2013 to  
22 compel Defendants to comply with the terms of their Collective Bargaining Agreement.

23 2. Plaintiffs served the complaint, summons, and court documents on Defendants on  
24 January 1, 2014. Defendants failed to answer by the January 21, 2014 deadline. Plaintiffs have  
25 not requested Entry of Default because the parties are attempting to resolve the matter informally.

26 3. Defendants have complied with the audit inspection sought in Plaintiffs' complaint.  
27 The audit report has been sent to Defendants and Defendants' counsel for review. Plaintiffs are  
28 advised that Defendants dispute a portion of the audit findings, and that they are gathering

documents to support their claim.

4. There are no issues that need to be addressed by this Court at the currently scheduled Case Management Conference. In the interest of conserving costs, as well as the Court's time and resources, Plaintiffs respectfully request that the Court continue the currently scheduled Case Management Conference for approximately sixty (60) days, in order to allow time for Defendants to provide documentation to support their dispute of the audit findings, for Plaintiffs and their auditors to review Defendants' documentation, and for the parties to resolve the matter.

Dated: May 21, 2014

**SALTZMAN & JOHNSON  
LAW CORPORATION**

By: \_\_\_\_\_/S/  
Michele R. Stafford  
Attorneys for Plaintiffs

IT IS SO ORDERED.

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby continued to 7/30/14, at 2:30 p.m., and all related deadlines are extended accordingly.

Date: 5/21/2014

  
\_\_\_\_\_  
THE HONORABLE SANDRA B. ARMSTRONG  
UNITED STATES DISTRICT COURT

PROOF OF SERVICE

I, the undersigned, declare:

1. I am a citizen of the United States and am employed in the County of San Francisco, State of California. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

2. I am over the age of eighteen and not a party to this action.

3. On **May 21, 2014**, I served the following document(s):

**PLAINTIFFS' REQUEST FOR CONTINUANCE OF CASE MANAGEMENT  
CONFERENCE; and [PROPOSED] ORDER THEREON**

on the interested parties in said action by enclosing a true and exact copy of each document in a sealed envelope and placing the envelope for collection and First Class mailing following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

4. The envelope was addressed and mailed as follows:

**Debra Hinshaw Vierra  
Cook Brown LLP  
555 Capitol Mall, Suite 425  
Sacramento, CA 94814**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **May 21, 2014**, at San Francisco, California.

\_\_\_\_\_/S/  
Michelle Valentine  
Paralegal